

United States Courts
Southern District of Texas
FILED

OCT 03 2018

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,

v.

LORENZO NICOLAS AGUILAR,

Defendant.

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Criminal Action No.: H-4:18-cr-

18 CR 599

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(POSSESSION OF A COUNTERFEIT IMMIGRATION DOCUMENT)

On or about August 22, 2018, in the Houston Division of the Southern District of Texas,

LORENZO NICOLAS AGUILAR

the defendant herein, did knowingly possess three (3) Form I-551 Lawful Permanent Resident Cards, which are documents prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, with the alien registration numbers of A091-302-751, A091-302-751, and A093-264-758, which the defendant knew to be forged, counterfeited, falsely made, and otherwise unlawfully obtained.

In violation of Title 18, United States Code, Sections 1546(a).

COUNT TWO

(POSSESSION OF A FALSE IDENTIFICATION DOCUMENT)

On or about August 22, 2018, in the Houston Division of the Southern District of Texas,

LORENZO NICOLAS AGUILAR,

the defendant herein, did knowingly possess without lawful authority, forged, counterfeited and falsely made Form I-551 Lawful Permanent Resident Cards, which are identification documents issued by the United States Department of Homeland Security, that were produced without lawful authority which the defendant knew about, and which contains authentication features of a holographic Department of Homeland Security seal, which was also produced without lawful authority which the defendant knew about, and both the identification documents and authentication features are and appear to have been issued under the authority of the United States.

In violation of Title 18, United States Code, Sections 1028(a)(6).

COUNT THREE

(POSSESSION OF A FALSE IDENTIFICATION DOCUMENT)

On or about August 22, 2018, in the Houston Division of the Southern District of Texas,

LORENZO NICOLAS AGUILAR,

the defendant herein, did knowingly possess without lawful authority, forged, counterfeited and falsely made Social Security Cards, which are identification documents issued by the United States Social Security Administration, that were produced without lawful authority which the defendant knew about, and which contain the authentication feature of a Social Security Administration Seal, which were also produced without lawful authority which the defendant knew about, and both the

identification documents and authentication features are and appear to have been issued under the authority of the United States.

In violation of Title 18, United States Code, Sections 1028(a)(6).

COUNT FOUR

(AGGRAVATED IDENTITY THEFT)

On or about August 22, 2018, in the Houston Division of the Southern District of Texas,

LORENZO NICOLAS AGUILAR,

the defendant herein, did knowingly possess without lawful authority a means of identification of another person, to-wit, alien registration number of C.A, during and in relation to a violation of Title 18, United States Code, Section 1546(a) (Possession of a Counterfeit Immigration Document) and Title 18, United States Code, Section 1028(a)(6) (Possession of a False Identification Document).

In violation of 18 United States Code, Section 1028A.

COUNT FIVE

(AGGRAVATED IDENTITY THEFT)

On or about August 22, 2018, in the Houston Division of the Southern District of Texas,

LORENZO NICOLAS AGUILAR,

the defendant herein, did knowingly possess without lawful authority a means of identification of another person, to-wit, alien registration number of A.K., during and in relation to a violation of Title 18, United States Code, Section 1546(a) (Possession of a Counterfeit Immigration Document) and Title 18, United States Code, Section 1028(a)(6) (Possession of a False Identification Document).


In violation of 18 United States Code, Section 1028A.

A TRUE BILL:

Original Signature on File

~~FOREPERSON OF THE GRAND JURY~~

RYAN K. PATRICK
United States Attorney, Southern District of Texas

A handwritten signature in black ink, appearing to read 'A. Goldman', is written over a horizontal line.

Adam Laurence Goldman
Assistant United States Attorney